U.S. DISTRICT COURT, SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

DAVID E. WADE	
c/o Florey Todd, LTD. 5 E. Long Street, Suite 600	:
Columbus, OH 43215	•
Plaintiff,	•
VS.	: Case No.:
	:
FRANKLIN COUNTY, OHIO c/o Franklin County Prosecutor	: :
373 S High St, Suite 14	· Indeed
Columbus, OH 43215	: Judge:
and	:
	: COMPLAINT
FRANKLIN COUNTY SHERIFF'S OFFICE c/o Franklin County Prosecutor	:
373 S High St, Suite 14	: JURY DEMAND ENDORSED HEREON
Columbus, OH 43215	:
,	:
and	:
	:
NICHOLAS BATES,	:
In His Individual And Official Capacities as	:
Employee of Franklin County Sheriff	:
c/o Franklin County Prosecutor	:
373 S High St, Suite 14	:
Columbus, OH 43215	:
and	
and	•
LESS LETHAL, LLC	· :
c/o Richard E. Juler, Statutory Agent	:
5463 Palisades Drive	:
Cincinnati, Ohio 45238	:
	:
and	:
	:
NOVA SECURITY GROUP, INC.	:
c/o Northwest Registered Agent Svc Inc	:
212 W. Troy Street, Ste B	
Dothan, AL 36303	: :
Defendants.	
Defendants.	:

COMPLAINT

Now comes Plaintiff, David Wade, and for his Complaint against Defendants, Franklin County, Ohio, Franklin County Sheriff, Dallas Baldwin, Nicholas Bates, Less Lethal, LLC and Nova Security Group, Inc., hereby states as follows:

PARTIES, JURISDICTION, AND VENUE

- 1. Plaintiff, David E. Wade ("Mr. Wade"), is an individual, residing in Ross County, Ohio.
- 2. Defendant, Franklin County, Ohio ("Franklin County"), is a political subdivision created and authorized under the laws of the State of Ohio.
- 3. Defendant, Franklin County Sheriff's Office ("Franklin County Sherriff"), is the chief law enforcement office and agency of Franklin County.
- 4. At all relevant times hereto, Franklin County established the regulations, customs, policies, and practices followed by Franklin County Sheriff and was responsibility for the organization, maintenance, operation, staffing, and supervision of the Franklin County Sheriff's department.
- 5. Upon information and belief, Defendant, Nicholas Bates ("Deputy Bates"), is an individual residing in Franklin County, Ohio, and at all relevant times, was an employee and duly sworn deputy or officer of the Franklin County Sheriff.
- 6. Upon information and belief, Defendant, Less Lethal, LLC ("Less Lethal"), is an Ohio limited liability company with its principal place of business in Hamilton County, Ohio, and conducts business throughout the State of Ohio, including Franklin County, Ohio.
 - 7. Upon information and belief, Defendant, Nova Security Group, Inc. ("Nova"), is

an Alabama corporation with its principal place of business in Dothan, Alabama, but which conducts business in the State of Ohio, and specifically places products in the stream of interstate commerce, that are sold and used in the State of Ohio.

8. This Court has jurisdiction over Plaintiff's claims because issues of federal law pervade and Plaintiff seeks monetary damages against Defendants for violation of rights guaranteed by the United States Constitution and federal law.

FACTUAL ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

SUMMARY OF INCIDENT

- 9. On or about October 22, 2019, Mr. Wade was in the custody of the Franklin County Sheriff's Office while criminal charges against him were pending in a case before the Franklin County Common Pleas Court (the "Court"), styled *State of Ohio v. David Wade*, and assigned Case No. 19 CR 001984.
- 10. Mr. Wade invoked his constitutionally-protected right to represent himself and serve as his own lawyer during a trial (the "Trial") that began on October 22, 2019.
- 11. As a condition to self-representation, the Court ordered Mr. Wade to wear a Nova R.A.C.C. stun belt (the "Stun Belt") during the Trial.
 - 12. The Stun Belt was designed to be activated by a remote-control device.
- 13. During a recess of the Trial, Deputy Bates took the remote control out of the courtroom, into a restroom and dropped the control into a toilet, after which the Stun Belt locked to Mr. Wade and shot 50,000 volts of electricity through his body for three, uninterrupted minutes (the "Violation").
- 14. The Stun Belt is an inherently dangerous instrumentality and Mr. Wade prays in this Complaint that the Court permanently enjoin the Franklin County Sheriff from using it and other products like it and to permanently enjoin Less Lethal and Nova from selling and/or

distributing the Stun Belt and other products like it.

PURPOSE AND USE OF THE NOVA R.A.C.C. STUN BELT

- 15. Although innocent until proven guilty, and although customarily only used when a defendant or incarcerated individual presents a danger to the court, or during transport of individuals who pose a flight risk, Mr. Wade was ordered to wear the Stun Belt as a means to control him during the Trial.
 - 16. Mr. Wade had no history of, and was not a flight risk.
 - 17. Mr. Wade had not history of poor behavior during court proceedings.
 - 18. Mr. Wade did not present a danger to the Court.
- 19. There was no finding or order of the Court that Mr. Wade, in representing himself at the Trial, presented a flight risk or was a danger to the Court.

NO WARNINGS OR WAIVER

- 20. The Franklin County Sheriff did not give Mr. Wade any written instructions or warnings regarding the Stun Belt.
- 21. The Franklin County Sheriff did not give Mr. Wade any oral instructions or warnings regarding the Stun Belt.
- 22. The Franklin County Sheriff did not give Mr. Wade any information or warning regarding the Stun Belt, including, but not limited to information and warnings related to use of the Stun Belt, its properties, and/or potential risks.
- 23. The Franklin County Sheriff was not in possession of, and did not request, any information regarding Mr. Wade's health to safeguard against risks specific to Mr. Wade in the use and application of the Stun Belt.
 - 24. The Franklin County Sheriff typically requires any individual compelled to wear

a stun belt provide a written waiver executing Franklin County and the Franklin County Sheriff's Office from any liability for harm caused by a stun belt.

- 25. The Franklin County Sherriff's personnel and/or deputies did not present a waiver form to Mr. Wade.
- 26. The Franklin County Sherriff's personnel and/or deputies did not request that Mr. Wade sign a waiver.
- 27. Mr. Wade never signed a waiver form related to the Stun Belt that he was forced to wear.
- 28. Prior to being shocked, the only information Mr. Wade had regarding the Stun Belt was that he had to wear the Stun Belt in order to represent himself during the Trial.
- 29. Nevertheless, the Franklin County Sheriff strapped the Stun Belt directly to Mr. Wade's torso, secured the Stun Belt with a metal lock, and pocketed both the lock and remote control activator.

DESCRIPTION OF INCIDENT AND CONDUCT OF FRANKLIN COUNTY

- 30. Upon information and belief, during the Trial, Deputy Bates was in charge of and controlled the Stun Belt remote.
- 31. Upon information and belief, at the time of the Violation, Deputy Bates was in charge of and controlled the Stun Belt remote.
 - 32. During a recess of the Trial, Deputy Bates went to the restroom.
- 33. When he went to the restroom, Deputy Bates did not pass custody of the Stun Belt remote to another deputy.
- 34. Instead, Deputy Bates took the Stun Belt remote to the bathroom with him and amazingly, dropped the remote into a toilet.

- 35. Instead of immediately removing the belt from Mr. Wade and securing him in some other fashion, Deputy Bates elected to leave the Stun Belt locked to Mr. Wade.
- 36. Surveillance footage shows that Deputy Bates considered it was funny that he had dropped the Stun Belt remote into a toilet.
- 37. Deputy Bates shared the joke with his fellow deputies, who he enlisted to help retrieve the remote from the toilet water.
- 38. Thereafter, the deputies dangerously retrieved the remote control from the toilet water while leaving the Stun Belt locked to Mr. Wade.
- 39. At the time of the Violation, Mr. Wade was quietly sitting in the courtroom, listening to recorded witness statements and preparing his defense for the Trial.
- 40. In contrast, surveillance footage shows Deputy Bates making vulgar gestures imitating the act of masturbating after he dropped the Stun Belt remote into the toilet.
- 41. In the process of removing the remote from the toilet and drying it off, the Stun Belt activated, sending at least 50,000 volts of electricity through Mr. Wade's body for a period of three, uninterrupted minutes.
- 42. The Franklin County Sheriff realized the situation was not a joke only after Mr. Wade was hit with 50,000 volts, causing grave injuries to Mr. Wade.
- 43. The Franklin County Sheriff's personnel and/or appointed deputies could not deactivate the Stun Belt.
- 44. The Stun Belt could not be removed from Mr. Wade's torso because the Franklin County Sheriff's personnel and/or appointed deputies lost the key to the Stun Belt lock.
- 45. Deputies ultimately removed the Stun Belt from Mr. Wade, which was still active and sending 50,000 volts through his body, by cutting it off with a knife.

- 46. During the Violation, Mr. Wade ended up on the floor of the courtroom writhing in pain and screaming, "What did I do? What did I do?"
- 47. Attached as Exhibit A is a true and accurate copy of an incident report (the "Incident Report") of the Violation, prepared by and kept in the ordinary course of business by the Franklin County Sheriff.

EVENTS AFTER THE VIOLATION

- 48. Immediately after the incident, Mr. Wade complained of physical injury.
- 49. Pictures in the attached Incident Report show marks on Mr. Wade's body resulting from the Violation, and serve as evidence of his injury.
- 50. The shocking incident was so severe that the Court declared a mistrial of Mr. Wade's criminal proceedings.
- 51. The Franklin County Sheriff issued a written reprimand to Deputy Bates, finding his conduct worthy of discipline. A true and accurate copy of the written reprimand is attached as Exhibit B hereto.

ACTIONS OF LESS LETHAL AND NOVA

- 52. Less Lethal and Nova are affiliated entities, sharing common ownership and control.
- 53. Together, Less Lethal and Nova design, manufacturer, distribute, sell and/or otherwise place into the stream of commerce the Nova R.A.C.C. stun belts.
- 54. Upon information and belief, Less Lethal and Nova, together, provide training to law enforcement for use of the Nova R.A.C.C. stun belts
- 55. Upon information and belief, Less Lethal holds itself out as the exclusive supplier of the Nova R.A.C.C. stun belt and related products.

- 56. Upon information and belief, Franklin County purchased the Stun Belt, and other Nova R.A.C.C. stun belts, from Nova and/or Less Lethal.
- 57. Upon information and belief Nova and/or Less Lethal provided training and/or training materials to the Franklin County Sheriff's personnel and deputies.
- 58. Upon information and belief, Nova R.A.C.C. stun belts are programmed to apply a pulsing shock of approximately 10 millionths of a second.
 - 59. Water is a commonly encountered substance.
- 60. Nova R.A.C.C. stun belts are advertised for use both indoors and outdoors, without limitation.
- 61. Yet if the Nova R.A.C.C. stun belt remote control comes into contact with water, the stun belt may malfunction such that the "shock" of 50,000-75,000 volts will continue uninterrupted for an indefinite period of time.
- 62. After the remote control kept by Deputy Bates came into contact with water, the Stun Belt malfunctioned such that a "shock" of at least 50,000 volts was applied to Mr. Wade for three, uninterrupted minutes.

INJURIES AND OTHER HARM TO WADE

- 63. Mr. Wade sustained serious and permanent personal injuries as a result of the Violation.
- 64. Mr. Wade sought medical treatment immediately after the Violation and continues to receive medical treatment while incarcerated.
- 65. Mr. Wade also suffers from post-traumatic stress disorder as a result of the Violation and battles ongoing, related anxiety and depression.
 - 66. Mr. Wade's injuries include physical harm, mental anguish, and emotional

distress.

67. The personal injuries Mr. Wade sustained were a direct and proximate result of the Violation, are severe and permanent, and have disrupted Mr. Wade's life.

COUNT ONE: 42 U.S.C. § 1983 VIOLATION OF RIGHTS SECURED BY FOURTEENTH AMENDMENT (Defendants Franklin County, Franklin County Sheriff, and Deputy Bates)

- 68. Plaintiff incorporates the statements above, the same as if fully rewritten herein.
- 69. Franklin County, acting under color of state law, deprived Mr. Wade of rights protected by the United States Constitution and/or federal law, causing harm to Mr. Wade.
- 70. The Franklin County Sheriff, acting under color of state law, deprived Mr. Wade of rights protected by the United States Constitution and/or federal law, causing harm to Mr. Wade.
- 71. Deputy Bates, acting under color of state law, deprive Mr. Wade of rights protected by the United States Constitution and/or federal law, causing harm to Mr. Wade.
- 72. Without limitation, Franklin County, Franklin County Sheriff, and Deputy Bates unlawfully deprived Mr. Wade of his right(s) to (a) procedural due process, (b) substantive due process, (c) equal protection, (d) protection against unreasonable searches and seizures under the Fourth Amendment to the United States Constitution, (e) confront and cross examine witnesses and counsel under the Sixth Amendment to the United States Constitution, and (f) protection against cruel and unusual punishment under the Eighth Amendment to the United States Constitution.
- 73. The actions and/or omissions of Defendants, Franklin County, Franklin County Sheriff, and Deputy Bates, as described above, are actionable under 42 U.S.C. § 1983.
 - 74. Said actions and/or omissions caused Plaintiff to suffer harm.
 - 75. The actions and/or omissions of Defendants Franklin County, Franklin County

Sheriff, and Deputy Bates, were made knowingly, intentionally, wantonly, and/or with reckless disregard for Plaintiff's safety and rights.

COUNT TWO: ASSAULT AND BATTERY

(Defendants Franklin County, Franklin County Sheriff, and Deputy Bates)

- 76. Plaintiff incorporates the statements above, the same as if fully rewritten herein.
- 77. Defendants, Franklin County, Franklin County Sheriff, and Deputy Bates, in their individual and official capacities, assaulted Plaintiff and committed battery when their actions resulted in Plaintiff being shocked for three, uninterrupted minutes.
- 78. Said Defendants intended to cause and did cause a harmful contact with Plaintiff's person.
- 79. Said Defendants intended to cause and did cause Plaintiff to suffer apprehension of an immediate harmful contact.
 - 80. Plaintiff did not consent to said Defendants' conduct or acts.
- 81. As a direct and proximate result of the conduct of Franklin County, Franklin County Sheriff, and Deputy Bates, Plaintiff suffered physical injuries, extreme mental anguish, and pain.
- 82. As a direct and proximate result of the conduct of Franklin County, Franklin County Sheriff, and Deputy Bates, Plaintiff was required to obtain medical services and treatment and will, in the future, be compelled to incur additional obligations for medical treatment.
- 83. The acts and/or conduct of Franklin County, Franklin County Sheriff, and Deputy Bates, were done knowingly, willfully, and/or recklessly and wantonly, with malicious intent, and Plaintiff is entitled to punitive damages in an amount to be determined by proof at trial.
- 84. As a result of the aforementioned conduct of Franklin County, Franklin County Sheriff, and Deputy Bates, Plaintiff suffered harm in an amount to be determined by the Court

and proven at trial, in excess of \$25,000.00.

<u>COUNT THREE: NEGLIGENCE</u> (Deputy Bates)

- 85. Plaintiff incorporates the statements above, the same as if fully rewritten herein.
- 86. Deputy Bates owed a duty to Mr. Wade to prevent physical injury and bodily harm.
 - 87. Deputy Bates breached that duty as described above.
- 88. As a direct and proximate result of Deputy Bates's breach of the duty owed, Plaintiff sustained harm.
- 89. Plaintiff suffered harm in an amount to be determined by the Court and proven at trial, in excess of \$25,000.00.

COUNT FOUR: NEGLIGENT DESIGN AND MANUFACTURE (Less Lethal and Nova)

- 90. Plaintiff incorporates the above statements as if fully rewritten herein.
- 91. Defendants, Less Lethal and Nova, designed, manufactured, and/or assembled the Stun Belt, which contained a defective condition.
- 92. This design, manufacture, and/or assembly defect made the Stun Belt unreasonably dangerous.
- 93. The Stun Belt remained unchanged and was in the same condition at the time of the Violation, resulting in personal injury sustained by Mr. Wade.
- 94. As a direct and proximate cause of the defectively designed, manufactured, and assembled Stun Belt, Plaintiff sustained permanent physical injury.
- 95. Plaintiff suffered harm in an amount to be determined by the Court and proven at trial, in excess of \$25,000.00.

COUNT FIVE: PERMANENT INJUNCTION

(Franklin County Sheriff, Less Lethal, Nova)

- 96. Plaintiff incorporates the above statements as if fully rewritten herein.
- 97. Because the Stun Belt is an inherently dangerous product, Plaintiff is entitled to a permanent injunction, pursuant to state and federal law, to prevent Franklin County Sheriff from using it and products like it.
- 98. Because the Stun Belt is an inherently dangerous product, Plaintiff is entitled to a permanent injunction, pursuant to state and federal law, to permanently enjoin Less Lethal and Nova from selling and/or distributing the Stun Belt and other products like it.

REQUEST FOR PUNITIVE DAMAGES

(As to All Defendants)

- 99. Plaintiff incorporates the above statements as if fully rewritten herein.
- 100. As described above, Defendants' engaged in willful, wanton, and reckless misconduct and malice, exhibiting a reckless disregard for the health and safety of patients.
- 101. The egregious and shocking conduct of Defendants, as described in this Complaint, could only result from widespread deficiencies and severely defective policies and practices, which Defendants failed to recognize, prevent, and/or remedy.
 - 102. Defendants' conduct warrants the imposition of punitive damages.

PRAYER FOR RELIEF

WHEREFORE, having fully stated the claims against Defendants, Plaintiff respectfully demands judgment as follows:

A. Against Defendants, jointly and severally, in an amount to be determined by the Court, in excess of \$25,000.00, plus interest, punitive damages for the intentional, egregious, and reckless misconduct of Defendants;

- B. Granting injunctive relief necessary to prevent the Franklin County Sheriff from using the inherently dangerous Stun Belt and other products like it;
- C. Granting injunctive relief necessary to permanently enjoin Less Lethal and Nova from selling and/or distributing the Stun Belt and other products like it;
 - D. Award Plaintiff the costs of this action, including reasonable attorneys' fees; and
 - E. And grant any other relief this Court deems just and equitable.

Respectfully submitted,

/s/ Adam F. Florey Adam F. Florey (0084826)

/s/ Adam R. Todd Adam R. Todd (0077284)

FLOREY TODD, LTD. 5 E. Long Street, Suite 600 Columbus, OH 43215 Phone: 614.427.1556 Fax: 614.427.1856 aflorey@law-flc.com atodd@law-flc.com *Attorneys for Plaintiff*

JURY DEMAND

Plaintiff hereby respectfully demands a trial by jury on all issues so triable.

Respectfully submitted,

/s/ Adam F. Florey Adam F. Florey (0084826)

/s/ Adam R. Todd Adam R. Todd (0077284)

FRANKLIN COUNTY SHERIFF'S OFFICE Routing Sheet for Correspondence

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FRANKLIN COUNTY SHERIFF'S OFFICE

SUPPORTING DETAILS

Deputy Narrative - (Sign/Date last page)

☐ U-10-100 (SHR-AD-27) Attached

IF narrative continues onto additional pages, ✓ here ☐.

Begin narrative here >> On 10/22/19 I was assigned to Courtroom 6F for the trial of Wade, David 19CR1984. I observed my partner for the day, Deputy Kevin Bennett #962, bringing Mr. Wade to Court at approximately 0900. It was at this point we headed up to our courtroom with Mr. Wade. Deputy Bennett gave me the remote for the RACC (Remote Activated Custody Control system) stun belt that Mr. Wade was wearing. Inmate Wade was unable to wear leg irons/shackles due to the fact that he was pro se and would need to move about the courtroom in front of the jury, without letting himself appear to be in custody. This was a court order.

During the lunch hour I went to use the rest room. It was at this point the remote fell off of my duty belt into the toilet water. I quickly returned to the courtroom to check on the welfare of Mr. Wade and to get another Deputy. After observing that Mr. Wade was unharmed Deputy Natalie Randall came back to assist me in removing the remote. I put on gloves and retrieved the remote. While I was gently drying it off I heard screaming from the courtroom. Fearing that the remote had shorted, I immediately ran to the courtroom. I could hear the belt cycling repeatedly shocking Mr. Wade. Deputy Teresa Hatzer #846 was with the inmate. I pulled the belt away from his body, but the device continued to malfunction and shock Mr. Wade. I then put my hand between the device and Mr. Wade's body to prevent further shocks from occuring. I instructed Deputy Todd Dennis #1151 to use a knife to cut the belt. Once removed, Deputy Dennis escorted Mr. Wade to the holding area in handcuffs while I advised both Sergeants Davis and Reiner what had taken place.

Then Deputy Bennett and I took Mr. Wade to medical. While there being evaluated I took pictures of Mr. Wade and his lower back. After cleared by medical Mr. Wade said he wanted to return to continue his trial. I then gave Mr. Wade a witness statement. <> End of narrative.

	COMPLETING DEPUTY SECTION ->		
<u>Nicholas Bates</u> PRINTED NAME	SIGNATURE	<u>1199</u> BADGE	10/22/2019 DATE
	REVIEWING SUPERVISOR SECTION		
Sof Drive L Roman R	of Oan Des	S.S.S. BADGE	12/19 DATE

Case: 2:21-cv-00305-EAS-CMV Doc #: 1 Filed: 01/22/21 Page: 17 of 31 PAGEID #: 17

Bureau #	FRANKLIN COL	INTY SHERI	FF'S OFFIC	E	I.A.B #				
***************************************	***************************************	WITNESSES	***************************************	2000-100	<u> </u>	· · · · · · · · · · · · · · · · · · ·	- Apple and the second of the		
Deputy / Witness - Last Name, First Name Hatzer, Teresa	Facility CPC	Job / Cell Assignm Deputy	nent		Ba 84	idge / Slate # 16			
Address (House number & Street Name) 345 S High St	*	City Columbus	***************************************	State OH		p Code 3215	Phone Number 525-8915		
Deputy / Witness - Last Name, First Name Dennis, Todd	Facility CPC	Job / Cell Assignm Deputy	nent			edge / Slate # L51			
Address (House number & Street Name) 345 S High St		City		State OH	1	p Code 3215	Phone Number 525-8915		
Deputy / Witness - Last Name, First Name Randall, Natalie	Facility CPC	Job / Cell Assignr Deputy	nent	***************************************	1	adge / Slate # 170	<u> </u>		
Address (House number & Street Name) 345 S High St	10.0	City Columbus		State OH	Zij	p Code 3215	Phone Number 525-8915		
Deputy / Witness - Last Name, First Name Bennett, Kevin	Facility CPC	Job / Cell Assignr Deputy	ment		Ва	adge / Slate # 52			
Address (House number & Street Name) 345 S High St	<u> </u>	City		State OH	Zi	p Code 3215	Phone Number 525-8915		
Deputy / Witness - Last Name, First Name	Facility	Job / Cell Assignr	nent			adge / Slate #			
Address (House number & Street Name)		City		State	Zi	p Code	Phone Number		
Deputy / Witness - Last Name, First Name	Facility	Job / Cell Assigni	ment		Ва	adge / Slate #			
Address (House number & Street Name)		City		State	Zi	p Code	Phone Number		
Deputy / Witness - Last Name, First Name	Facility	Job / Cell Assigni	ment	<u></u>	В	adge / Slate #			
Address (House number & Street Name)	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	City		State	Zi	p Code	Phone Number		
Deputy / Witness - Last Name, First Name	Facility	Job / Cell Assign	Job / Cell Assignment						
Address (House number & Street Name)		City State			Zi	ip Code	Phone Number		
	A	DDITIONAL SUBJE	:CTS	<u></u>			<u> </u>		
Subject - Last Name, First Name	Social Security Number	D.O.B.	Age	Sex	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Height	Weight		
Alias(s)	Slate #		Cell Assignment	·••		Facility	·		
Address (House number & Street Name)		City		State	Zi	p Code	Phone Number		
Subject - Last Name, First Name	Social Security Number	D.O.B.	Age	Sex		Height	Weight		
Alias(s)	Slate #		Ceil Assignment		***************************************	Facility			
Address (House number & Street Name)	and the second s	City	<u></u>	State	Zi	p Code	Phone Number		
Subject - Last Name, First Name	Social Security Number	D.O.B.	Age	Sex	L	Height	Weight		
Alias(s)	. Slate #	<u> </u>	Cell Assignment		***************************************	Facility			
Address (House number & Street Name)		City		State	Zi	ip Code	Phone Number		
Subject - Last Name, First Name	Social Security Number	D.O.B.	Age	Sex		Height	Weight		
Alias(s)	Slate #	<u> </u>	Cell Assignment		profession and the second se	Facility			
Address (House number & Street Name)		City		State	Z	ip Code	Phone Number		

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Bureau #	Offense #	······································	FRANI	KLIN COUN	**************************************		T	\.B.#	I	CAD#	
☐ Response	leport to Aggression	n Report	Incid	ent Report /	Response	e to Aggres si	ion				
	annan ara a ta a ta a ta a ta a ta a ta		<i></i>	PROFIL	E INFORM/	ATION	······································			•	
Deputy - Last Hatzer, Teresa	Name, First Nam	ne		Badge 846	***************************************	Assignmen		Age 57	Sex f	Height 5'4"	Weight
Subject 1 - La Wade, David	st Name, First Na	ame		Social Security	Number	D.O.B. 10221979	750000000000000000000000000000000000000		Sex m	Height 6'1"	Weight 180
Alias(s)	***************************************		Slate # 0378605		Cell Assign			Facility fccc 1		1 0 1	1 200
Address (House	se number & Stre	eet Name)		Telegraphic Control of the Control o	City Columbus		State	Zip Code 43211		Phone Numb	ber
Date Tim 1022201 130	ne Loc	cation	-ll Obl. #224	-	Zone / Dis		- OH		tched Run	☐ Injury to Deputy ☐ No Injury Reported	
9 1022201 130		······································	olumbus, Ohio 4321	**************************************	4/41			☐ Self-Ir ☐ Jail Inc	nitiated ident		
		4	SPONSE SUBJECT	ACTIONS - CHE	CK ALL THA	AT APPLY		⊠ Other	Courts	☐ Injury 1	to Other
☐ Not Respor ☐ Refusing to	hysical Danger Cue ading to Command: Move—Passive Res By From Deputy	s 🔲 Pu sistive 🗇 W	inning From Deputy Ishing Deputy restling With Deputy riking or Kicking Deputy	¥	☐ Life Th	ting Third Party reatening Weaponle pting to Disarm Dep pting to Escape		Weap	on Type Party Involv	gainst Deputy vement	
		······································		VEL OF CONTRO	L – CHECK	ALL THAT APPL	X	, La Other	HBZV.		
Force Not Used		bal commands.	☐ Handcuffs gapped and		CTIVE, 1 = INEFFI		Tasar Sparkod fo			Maria maria da Cara da	
☐ Empty Hand Co	ntrol (pressure point/			***************************************	**************************************	, in the lands of	ma reservence	COmpilation.			
PPCT: Joint Manipulation Grounding Techniq		Ē	infra-Orbital	Ē I	Hypoglossal	<u>E</u> L					
Physically Placed o			Transport Wrist Lock Wrist Roll		Jugular Notch Other		Explain;				
Use of Immobil	izing Restraint	E	Explain:	· · · · · · · · · · · · · · · · · · ·			·····		· · · · · · · · · · · · · · · · · · ·		
Use of OC Spray	1	Ē b	☐ Use of C.E.D.	E D D	***************************************	***************************************	***************************************	**************************************	······································	***************************************	***************************************
	nd Control (strike/kici	k/punch)	•	**************************************	E I		"E 1.		E I	THE RESERVE OF THE PERSON OF T	***************************************
Technique Usad			Common Peroneal Suprascapular Brachial Plexus Origin			Femoral Radial Brachial Plexus Tie-in	88	Tibial Median Other	0 0 0 0 0 0 Ex	olain;	
☐ Use of Impact V Weapon Used:	Veapon		Common Peroneal			Family	£_i		£1	······································	
	······································	***************************************	Radial			Femoral Median	88	Tibial Other	B B Ex	plain;	
Police K-9 (Bite		<u> </u>									
Less Lethal Cont	(roi	40mm	Ĕ I Knee Kr	nockers D D	Sting Balls Stinger Gre		E Other	j □ Explain;	***************************************	***************************************	
☐ Deadly Force		Primary Fire	arm 🚨 🚨 Bac	skup Firearm	E	E		////////		***************************************	
		DE	PUTY-SUBJECT FA	CTORS/SPECIAL	LCIRCUMS	TANCES - CHEC	K ALL THẠT A	PPLY	7.514		
Deputy-Subject	Factors:	Special Cir	cumstances:	COM AFFER MOST BE	ARTICOLATED IN	atnin inenangaliyi		<u> </u>			
☐ Age ☐ Size ☐ Sex	☐ Multiple Subjects ☐ Multiple Deputies ☐ Relative Strength	s rous	ons II Taken	ity of Cost	tion of incident (ect Handcuffed	t (Charges, Prior Compl Environmental factors)		***************************************	· · · · · · · · · · · · · · · · · · ·	***************************************	
				REPORTED N	MEDICAL TR	EATMENT	a sama		n'e		
Deputy's Injuries	(described):	3	• None				A				and Maria Selection
Treated Ou tinds	oal/FMC/Unambas		*		16 Marian 18 Maria 18	***************************************		Profiler			***************************************
Subject's Injuries	cal/ EMS / Hospital	ப, ior what	By whom:		······································			······································	·····	······································	· · · · · · · · · · · · · · · · · · ·
		3	red marks on lower ba	ck		·		** **********************************	***************************************		
Transa d B	adirage in		***************************************	***************************************		······		<u> </u>		чашин үнүй башан	······································
☐ Injuries Prior (cal/EMS/Hospital	23, for what:	red marks By whon	n: Tasha Smith LPN							
U-10.128A (5/20		***************************************					***************************************		***************************************	***************************************	

Case: 2:21-cv-00305-EAS-CMV Doc #: 1 Filed: 01/22/21 Page: 19 of 31 PAGEID #: 19

Bureau #	FRANKLIN COUNTY SHERIFF'S OFFICE	I.A.B #
	SUPPORTING DETAILS	THE PROPERTY OF THE PROPERTY O
Deputy Narrative – (Sign/Date last page)		
☐ U-10-100 (SHR-AD-27) Attached IF narrative continues onto additional pag	res, ✓ here □.	
Inmate David Wade 0378605. Dep. Nichol him. Dep. N. Randall #1070 said she would Inmate David Wade started screaming, go very short intervals. I ran over to the door When Dep. Bates ran into the courtroom Dep. N. Randall, marked for Sgt. David Rei remote and attempted to remove the bat	22/2019 at 1301 hours , I was sitting in courtroom 6F with Deputy N las Bates #1199 opened the door from the breezeway to the courtre digo with Dep. Bates #1199 while I stayed in the courtroom with instit down on his knees and said I didn't do anything wrong. I then read, opened it and yelled "Hey" as Dep. Todd Dennis #1151 and Dep. The said the remote for the stun belt was shorting out. I ran into the liner CS1 and Sgt. Tom Davis CS4 to come to the holding cell for 6 E/tery but was unable to get the battery out. Dep. Bates then came in Wade into the first holding cell. Sgt. Reiner and Sgt Davis arrived should be supported to the said the first holding cell.	oom and asked for one of us to come out with mate David Wade. After about a minute or so lized I could hear the stun belt going off at N. Bates #1199 were running toward me. holding cell area and took the remote from 'F courtrooms. I removed the back off of the nto the holding area holding the stun belt and
	COMPLETING DEPUTY SECTION	
<u>Teresa L. Hatzer</u> PRINTED NAME	SIGNATURE	846 PADGE DATE
	REVIEWING SUPERVISOR SECTION	MANUSE A PARTICIPATION OF THE PARTIES OF THE PARTIE
Sof DAVIE REINER	2 JUNESIGNATURE	BADGE DATE

Case: 2:21-cv-00305-EAS-CMV Doc #: 1 Filed: 01/22/21 Page: 20 of 31 PAGEID #: 20

Bureau #	Offense #			_				***************************************	***************************************			FF'S OFF	······	I.A.			CAD#	
☑ Incident R ☐ Response		on Rec	ort		Incident Report / Response to Aggression								n					
				lan		***************************************	. J	PROFI	LE INI	FORM	ÁTIO	N				*2		** E***
Deputy - Last Dennis, Todd	Name, First Na	ame					Badge 1151				,	Assignment CP			Age 46	Sex M	Height 6'1"	Weight 243
Subject 1 - La WADE, DAVID	st Name, First	Name					Social S	Security	Num	ber					Age 40	Sex M	Height 6'1"	Weight 180
Alias(s)					nte # 178605					Cell Assignment 3WL6				Facility FCCC1				
Address (Hous	se number & S THA ST.	treet N	ame)							ty DLUMBI	US		State	2	Zip Code 43211		Phone Number	
Date Tin	1	Location							1	Zone / District			1	☐ Dispatched Run 🔯 Injury			o Subject o Deputy	
				E / RESPONSE SUBJECT ACTIONS - CHECK ALL THAT APPLY										☐ Jail Incident ☐ No Injury Report				
□ Verbal or Physical Danger Cues □ Running From Deputy □ Assaulting Third Party □ Using Weapon Against Deputy □ Not Responding to Commands □ Pushing Deputy □ Life Threatening Weaponless Assault Weapon Type □ Refusing to Move-Passive Resistive □ Wrestling With Deputy □ Attempting to Disarm Deputy □ Third Party Involvement □ Pulling Away From Deputy □ Striking or Kicking Deputy □ Attempting to Escape □ Other											1444 () (143) (143) (144) (144) (144) (144) (144) (144) (144)							
		·				LE\	VEL OF C					THAT APPLY	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	*	, i. 5,	22		
Force Not Use		-verbal co	mmands.	23 H	andcuffs gappe	d and	double locks	***************************************	***************************************	I = INEFF	atmin	Handcuffing.	Taser Spa	rked for	compliance.		t. Tata iida iida ada iida iida iida iida iida iida i	en se Star !
	antrol (pressure po					***************************************		***************************************	*	***************************************			***************************************	w <u></u>	.,			
Joint Manipulation Grounding Technic Physically Placed	ique			Tra	fra-Orbital ansport Wrist L Irist Roll	ock		E 000	Jug	poglossal gular Note her	:h		xplain:					
☐ Use of Immob	ilizing Restraint	······	E	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	splain:								,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	***************************************		······		
☐ Use of OC Spra			E 6	*	Use of C.E.D.			,,,,										
☐ Hard Empty H	and Control (strike	/klck/pui		;		***************************************		ter en	E	ı	!		E		1	E I		***************************************
Technique Use	d:			; Su	mmon Peronea prascapular achial Piexus O						Rad	noral ial chial Plexus Tie-in	È	8	Tibial Median Other		Explain:	
Use of Impact	Weapon			*					E		3		E.			E L		
Weapon Used:					ommon Perone: idial				8	8		noral dian	8	3	Tibial Other		ixplain:	·
Police K-9 (Bit			Ē			***************************************		******************		***************************************		····						
Less Lethal Co	entrol		40mm	{ [<u> </u>	nee K	nockers		֓֞֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓	Sting Bal		. [Other	Ē	l □ Explain:			
☐ Deadly Force		1	Primary F				ckup Firearn			6	E	t 🗖 Other						
	Tie .		C	EPU	TY-SUBJEC	T FA	ACTORS/	SPECI Y MUST	AL CI BEARTI	RCUM CULATED	STAI	VCES — CHECK IN THE NARRATIVE	(ALL TH	IATA	PPLY X			
Deputy-Subjec	t Factors:		Special (ircum	stances:	·······································	***************************************				***************************************		1-11-1-1-11-11-11-11-11-11-11-11-11-11-					
☐ Age ☐ Size ☐ Sex	☐ Multiple Sub ☐ Multiple Dep ☐ Relative Stre	puties	☐ Injury	apons	0		to Ground nity of ct		ocation (it (Envi	arges, Prior Compla ronmental factors)	ints, etc.)			MI(,		-
	······································		 	1	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	er-copping	REPO	ORTED	MED	OICAL 1	TREA	TMENT	······································			61-14	11.4	
Deputy's Injur	les (described):	***************************************	***************************************	1, ,	NONE			*************	****									
				2.														
	dical/ EMS / Hos		, for wha	:	By wh	om;												
Subject's injur	les (described):			1	red marks on lo	wer b	ack											
				2		******		*****************		·/>-			nnnnnnnuce-		······································			
Treated By Me	dical/ EMS / Hos	spital 🛭	, for wha	t: r	red marks By	who	m: CC1 LPN	Tasha Sr	nith									
☐ Injuries Prio	or Contact (Explai	in):																

Case: 2:21-cv-0030	5-EAS-CMV Doc #: 1 Filed: 01/22/21 Page: 2	1 of 31 PAGEID #: 21
Bureau #	FRANKLIN COUNTY SHERIFF'S OFFICE	I.A.B #
Deputy Narrative – (Sign/Date last pag	SUPPORTING DETAILS	
☐ U-10-100 (SHR-AD-27) Attached IF narrative continues onto additional p	ages, ✓ here □.	
ogneered to be coming from court room 0378605 yelling and screaming with his at about 2 to 3 second intervals and cor	t approx. 1304 hrs. I (Deputy T. Dennis #1151) was in Common Pleas n 6F. I immediately ran through the breezeway and into court room knees on the floor and his hands on the top of the table. At that tim htinued this action for approx. 7 seconds before Deputy Bates, Nick # lt could not be located at that momment so I used my knife to cut th	6F. Upon entering I saw Inmate Wade, David ne I could hear that the stun belt was activated

area in the breezeway. I uncuffed Inmate Wade and secured the door without further incident. << End of narrative.

			• (1)
	COMPLETING DEPUTY SECTION		
<u>TODD DENNIS</u> PRINTED NAME	Clay T. Caussins SIGNATURE	<u>1151</u> BADGE	<u>10-22-19</u> DATE
	REVIEWING SUPERVISOR SECTION		
St. SAND KEINER PRINTED NAME	of Charles SIGNATURE	S35 BADGE	10-22-19 DATE

continued to go off for several minutes after it was removed from his body.) I then placed handcuffs on Inmate Wade and escorted him to the holding cell

Case: 2:21-cv-00305-EAS-CMV Doc #: 1 Filed: 01/22/21 Page: 22 of 31 PAGEID #: 22

Bureau #	FRAN					LIN	COL	ראנ	TY SH	IERI	FF'S	OFFI	CE	I.A.	B. #		CAD#	***************************************
□ Incident Report □ Response to Aggression Report						ent Re	port	/ R	espon	se to	Agg	ression						
				~,,1,,~	***************************************	***************************************	PRO	FILE	INFORM	VIATIO	N	······································	1 1		4.	44		
Deputy - La RANDALL, N	ost Name, First NATALIE	l Name	**************************************	······································		Badge 1070		***************************************	······································	and the second s	Assig	gnment			Age 37	Sex	Height 5'3	Weight
Subject 1 - WADE, DAV	Last Name, Fi	rst Name	e	- IIII. II			l Secur	itv N	umber	***************************************	D,O.	B. 2-1979			Age 40	Sex	Height 6'1	125 Weight 180
Alias(s)	The state of the s			Slate # 0378605	***************************************	22			Cell Ass 3WL6	ignme			······································		Facility MJ	1	1	1 100
Address (Ho 2542 HIAW	ouse number & ATHA ST	& Street	Name)		······································		·		City COLUM	BUS	 • . • 		State OH		Zip Code		Phone Numl	per
Date Time Location 10-22- 2019 345 SOUTH HIGH ST COLUMBUS OH COURTROOM 6F					S OH 4	13215	***************************************		Zone / [4/41	District	anning and the second				☐ Dispat	ched Run	⊠ Injury	to Subject to Deputy
	······································	finairean	***************************************	SPONSE SUB	ECT /	ACTION	VS — C	HECI	K ALL TI	HAT A	PPLY	***************************************	, , , , , , , , , , , , , , , , , , ,		☐ Jail Inc			ury Reported to Other
□ Verbal or Physical Danger Cues □ Running From Deputy □ Assaulting Third Party □ Using Weapon Against Deputy □ Not Responding to Commands □ Pushing Deputy □ Life Threatening Weaponless Assault Weapon Type □ Refusing to Move—Passive Resistive □ Wrestling With Deputy □ Attempting to Disarm Deputy □ Third Party Involvement □ Pulling Away From Deputy □ Striking or Kicking Deputy □ Attempting to Escape □ Other																		
				:	LEV	EL OF			- CHEC			APPLY	~> .		*	#- K Y		×
☐ Peputy Pres	sed ence, verbal and n	on-verbal o	commands.	☐ Handcuffs gappe	ed and d	fouble foc	***************************************	******	***************************************	************************	4	iffing. Π Ta	ser Sparke	ed for c	omolizace			
☐ Empty Hand	Control (pressure	point/join	t manipulation	/ pain compliance)		····		· · · · · · · · · · · · · · · · · · ·	**************************************	***************************************		***************************************	ou, opui no	24 (01 4)	or representati			······································
Grounding Tech	Joint Manipulation E Infra-Orbital E Hypoglossal Crounding Technique Infra-Orbital Hypoglossal Crounding Technique Transport Wrist Lock Crounding Technique Unifra-Orbital Hypoglossal Crounding Technique Unifra-Orbital																	
☐ Use of Immo	bilizing Restraint	······································	Ē 'a	Explain:								***************************************	***************************************					
Use of OC Sp			Ē	☐ Use of C.E.D		U C					2							***************************************
Hard Empty Hand Control (strike/kick/punch) Technique Used: Suprascapular Brachial Plexus Origin								E 000	Fem Radi Braci		us Tie-in		***	Tibial Median Other		xpla(n;		
Use of Impac Weapon Used				Common Perones	ıl				<u> </u>	#	E I Tibial □ □ Other □ □ Explain;							
☐ Police K-9 (B)	ite Only)	***************************************	Ē b	\$ \$	***************************************	***************************************	***************************************	••••	***************************************	<u>.</u>		***************************************					- Nait:	
Less Lethal C	ontrol		40mm	E 6 k	nee Kno	ckers	E	.	Sting Ba		filina nanisada anterior com			£	Explain:	······································	77)	,
☐ Deadly Force	**************************************	1	Primary Fire	arm E b	Back	up Firearn	n		E	F E	************	······································			***************************************	!!!!		www.commons.com
	***************************************	······································	DE	PUTY-SUBJEC	T FAC	TORS/	/SPECI	AL C	IRCUM	STAN	CES -		LL THA	TAPI	PLY 4		C 510(1)	
Deputy-Subje	ct Factors:		Special Cir	cumstances:		11111111111	-	THE MA	HCOOKIED	WHITE	INENA	MMAIIVE J		i ma ini			.E.A.	e proces
☐ Age ☐ Size ☐ Sex	☐ Multiple St ☐ Multiple Do ☐ Relative St	eputies	☐ Proximit Weap ☐ Injury or Exhaus	ons O F	aken to roximit iubject	Ground y of		ocation ubject	dge of Subj n of Inciden Handcuffe	it (Enviro		r Complaints, factors)	etc.)			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
				·	***************************************	REPC	ORTED	ME	DICAL 7	REAT	MENT	n Patiliti					公 格·克	
Deputy's Injur	ries (described):		1	NONE	~~~~	***************************************			······································	***************************************	· · · · · · · · · · · · · · · · · · ·			ú.aa	······································			e kirimanake, ku j
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Case: 2:21-cv-00305-EAS-CMV Doc #: 1 Filed: 01/22/21 Page: 23 of 31 PAGEID #: 23

Bureau #	FRANKLIN COUNTY SHERIFF'S OFFICE	I.A.B #
	SUPPORTING DETAILS	THE RESERVE THE PROPERTY OF THE PARTY OF THE

Deputy Narrative - (Sign/Date last page)

☐ U-10-100 (SHR-AD-27) Attached IF narrative continues onto additional pages, ✓ here □.

Begin narrative here >> On Tuesday October 22, 2019, at approximately 1:01pm, I was sitting in courtroom 6F with Deputy Teresa Hatzer #846 providing security for inmate David Wade 0378605. Inmate Wade was listening to audio recordings in regards to his trial. Deputy Nick Bates #1199 enters the courtroom and asks if one of us could come to the back where the inmates are secured. I volunteered to go to see what Dep Bates needed. When we got into the holding area, Deputy Bates showed me that he had dropped the stun belt remote into the toilet. Dep Bates put on gloves and retrieved the remote from the toilet. The remote was dripping with toilet water. Dep Bates grabbed paper towels and began to dry the remote. Just about that time I heard inmate Wade screaming. I looked at Dep Bates and said I think the belt is stunning him. I could hear the stun belt had activated. I tried to take the back off the remote to remove the battery. Deputy Hatzer then entered the holding area and took the remote. She was able to get the back off but the battery was still stuck inside. Dep Bates then entered the holding area with the stun belt that was still activated. Inmate Wade was escortd into the holding cell by Deputy Todd Dennis #1151. << End of narrative.

	COMPLETING DEPUTY SECTION		
<u>DEPUTY NATALIE RANDALL</u> PRINTED NAME	Seputy Natali Randall SIGNATURE	<u>1070</u> BADGE	10/22/2019 DATE
	REVIEWING SUPERVISOR SECTION		
S.F. SAUCE REWEN	of Clare Signature	S31 BADGE	10/03/14 DATE
U-10.128A (5/2012)			

Case: 2:21-cv-00305-EAS-CMV Doc #: 1 Filed: 01/22/21 Page: 24 of 31 PAGEID #: 24

Bureau	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Offense	se # FRANKLIN COU						NTY	'SH	IERI	FF'S	OFFI	CE	I.A.E	3. #			CAD#	***************************************		
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Case: 2:21-cv-00305-	EAS-CMV	5 of 31 PAGE	EID #: 25
Bureau #	I.A.B#		
	SUPPORTING DETAILS		
Deputy Narrative - (Sign/Date last page	P)		
third floor Commom Pleas Courthouse to trying to get the battery out of a stun bel She told me the controller had fallen off coming through the holding cell door, the	iges, ✓ here □. Tr 22,2019 I was working Courtroom 6F, while on lunch break aroust to pick up a piece of paper. When I returned to Courtroom 6F holding it controller. She told me Inmate David Wade 0378605 was being Deputy Nicholas Bates gun belt while he was using the restroom, it is stun belt had been cut off of him, he was placed in the holding cold and cleared by nurse Tasha Smith Lpn. << End of narrative.	ng cell area, I saw Dep shocked by the stun into the toilet. Inmate	puty Teresa Hatzer #856 belt he was wearing.
	COMPLETING DEPUTY SECTION	**************************************	77777
<u>Kevin Bennett</u> PRINTED NAME	Kur KVRFT SIGNATURE	962 BADGE	10/23/2019 DATE
	REVIEWING SUPERAISOR SECTION		1 1
Sof David Remel	SIGNATURE	ع قر <u>ي</u> BADGE	0/03/19 DATE

U-10.128A (5/2012)

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Franklin County Sheriff's Office Division of Corrections Statement of Witness

CONSTITUTIONAL RIGHTS

Before we ask you any questions, you must understand your rights. (1.) You have the right to remain silent. (2.) Anything you say can be used against you in court. (3.) You have the right to talk to a lawyer for advice before we ask you any questions, and to have him present with you during questioning. (4.) If you are unable to pay a lawyer, a public defender will be appointed for you prior to any questioning, if you so desire. (5.) If you wish to answer questions now without a lawyer present, you have the right to stop answering questions at any time. (6.) You also have the right to stop answering at any time until you talk to a lawyer.

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WAIVER				
I have read the statement of my rights shown at and know what I am doing. No promises or three				
Signed this day of	,19, at FCC0	CIFCCC II (circle one) at _	/M.	
What is the highest level of education yo	u attained?	Do you read and v	vrite? Yes 🔲 No 🗔	
Do you wear glasses or contacts? Yes	□ No □	Do you have a hea	aring problem? Yes	No 🗖
Witness	on.			
Witness	_ Signed		Management of the second of th	
The person giving this statement is	s not suspected of com	nitting a crime and was not	advised of his/her rights.	X
	STATEN	1ENT		
I. David Wade do hereby ma accord, concerning an incident that occurred at I was in the Courtroom his my waist when it just began possibly a minute and a had of me. I was treeded in	shocking me deputies medically.	the one) on the day of arms Nove calls. I have constituously for be come to my aid	don a stunbell tween a minute	free will and 1430 M. apound and apound all the state of
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I have read the above statement consisting of on 0.70350 22 ,20/9. It was given	pages and attest the by me freely and volume Signed	at it is a true and accurate ac ntarily without fear of threat	count of the events which t or promise of reward.	took place
Witness Al One Ofice	Page 1 of		ry in man a state of the state	
SHR-CC-40-B-10/94	- Production			

Franklin County Sheriff's Office Division of Corrections

Incident Report Photographs



Object description (if needed)

Overview of inmate

	Wade, David #21090405113							
Taken by:	Dep. Bates #1199							
Time taken:	1334							
Date taken:	10-22-19							
	2 of 3							

Franklin County Sheriff's Office Division of Corrections

Incident Report Photographs



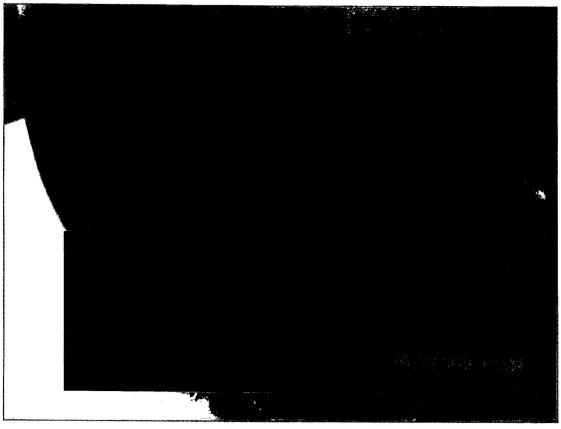
Object description (if needed)

Overview of inmate

Inmate:	Wade, David #21090405113						
Taken by: Dep. Bates #1199							
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Date taken:	10-22-19						
	1 of 3						

Franklin County Sheriff's Office Division of Corrections

Incident Report Photographs



Object description (if needed)

Overview of inmate

Inmate:	Wade, David #21090405113								
Taken by:	n: 1334								
Time taken:									
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	3	of	3						

Inmate Name: WADE, DAVID Booking #: 20190405113 SO #: 0378605 Wednesday, October 23, 2019 FRANKLIN COUNTY 2:13:56 PM LOCATOR CARD Prisoner Type: FELONY Bin#: 304 6 ft 01 in Height: Booking Location: FCCC1 Weight: 180 Age: 40 Incarceration Date 04/05/2019 DOB: 10/22/1979 Hair Color: BLK Incarceration Tim 21:59 R/S: B/M EyeColor: BRN Assigned Housing: MJ-1-3-WL-06-01 ALERT DESCRIPTION: ALERT NARRATIVE: SINGLE CELL HOUSING 2 3 OVER 3 ALERTS: KEEP SEPARATE FROM: 0127597 - STEWARD, KEITH SONNY; 0166118 - ABBOTT, JORDAN LAWRENCE; 0401618 - LAWRENCE, RYAN WILLIAM; 0058828 -HEISER-MULLINS, SEAN P **OVER 6 NAMES: Primary Charge Description** Case #: Indict and Arraign Date: Commit Document: B.O. Date: PROMOTING PROSTITUTION 6353 COMPLAINT 2 APA PAROLE HOLD HOLDER 3 PROMOTING PROSTITUTION 19CR1984 5 6 Over 6 Cases: Alias Names: WADE, DAVID E - WADE, DAVID E Over 8 Names: Hold Date/Time: Hold by: Hold Dept: Hold Rem. Date/Time: Hold Rem. By: Hold Rem Dept: 1 2 3 Over 3 Holds: Housing: Pod: Date: Pod: Date: Pod: Date: Pillow Case: Blanket: Dress: Underwear: Mattress: Pants: Sheet: PH Kit: Pillow: Towel: Shirt: Trustee Uniform/Footwear: I RECEIVED THE ABOVE LISTED ITEMS WHEN CONFINED IN THE Franklin County. I UNDERSTAND THAT I WILL BE RESPONSIBLE FOR ANY OF THESE ITEMS THAT MAY BE LOST OR DAMAGED. I FURTHER UNDERSTAND THAT STATE STATUTES PROHIBIT THE DAMAGING OF COUNTY PROPERTY AND IS PUNISHABLE BY STATE LAW.

WADE B/M Pch

WADE, DAVIDB/M 10/22/1979

Witness

0378605 * 2 Exhibit A 5 1 1 3 * Case: 2:21-cv-00305-EAS-CMV Doc #: 1 Filed: 01/22/21 Page: 31 of 31 PAGEID #: 31



FRA. KLIN COUNTY S. ERIFF'S OFFICE

Sheriff Dallas Baldwin

MEMORANDUM

To:

Deputy Nicholas Bates

From:

Chief Deputy Michael Flynn

Date:

October 25, 2019

Subject:

Written Reprimand



This is to advise you that you are being issued a written reprimand as a result of violating the following rules and regulations:

- 102.9 Neglect or Inattention to Duty
- 102.13 Care of Office Property
- 102.29 Unbecoming Conduct

On October 22, 2019, you and other deputies were in control of an inmate wearing a stun-belt. You left the courtroom to use the restroom and did not pass the stun-belt actuator to another deputy. While in the restroom you dropped the actuator in the toilet. After removing the actuator and attempting to dry it, the actuator activated causing the stun-belt to continuously cycle until the belt was cut off.

If such conduct continues, further disciplinary action will be taken which could result in your removal from service.

BY ORDER OF:

Chief Deputy Michael Flynn

ENTERED

☐ Checked by Human Resources

cc: Sheriff Baldwin Major Oyer

Human Resources